

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

BENJAMIN DENEWETH,

Plaintiff,

v.

Case No.: 2:23-cv-11545

Hon. Linda V. Parker

Mag. Judge Anthony P. Patti

COUNTY OF MACOMB, a political
subdivision and PETER LUCIDO, in
his individual capacity and separately
in his official capacity,

Defendants.

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**JOINT STATEMENT OF RESOLVED AND UNRESOLVED ISSUES
REGARDING DEFENDANT LUCIDO'S RENEWED MOTION FOR
PROTECTIVE ORDER (ECF NOS. 46, 62)**

Resolved Issue No. 1

Whether the Court should issue a protective order limiting Discovery (including interrogatories, requests for production, and deposition questions to witnesses) to the facts and circumstances related to the hiring decision at issue in this case, and prohibiting discovery into unsubstantiated complaint unrelated to Plaintiff, this hiring decision, sexual orientation, and disability and remote in time to this hiring decision by years.

Movant's Position:

On July 30, 2024, Plaintiff stipulated to entry of Defendant Lucido's proposed Protective Order which provides:

All future discovery by Interrogatory, Request for Production of Documents, and Deposition, shall be limited to the facts and circumstances related to the hiring decision involving Plaintiff, Defendants' hiring practices and Plaintiff's allegations of sexual orientation and disability discrimination, slander and tortious interference with a contract and/or business relationship/expectancy.

Defendant Lucido will submit the proposed Protective Order for entry with the court withdraw this motion.

Respectfully Submitted,

Cummings, McClorey, Davis & Acho, PLC

By: /s/ TIMOTHY S. FERRAND
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Dated: July 30, 2024

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2024, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the attorneys of record, and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: none.

Cummings, McClorey, Davis & Acho, PLC

By: /s/ Timothy S. Ferrand